

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

IZAYE EUBANKS,
aka "JoJo"

Defendant.

CASE NO. 3:23-cr-00076

JUDGE Michael J. Newman

INFORMATION

18 U.S.C. § 2

18 U.S.C. § 249(a)(2)

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION/BACKGROUND

At all times relevant to this Information:

1. R.L. is an adult man who immigrated from Haiti to the Springfield, Ohio area.
2. J.M. is an adult man who immigrated from Haiti to the Springfield, Ohio area.
3. Defendant **IZAYE EUBANKS** a.k.a. "JoJo" is an adult black man who resides in the Springfield, Ohio area.
4. The introductory and background allegations as set forth in paragraphs 1 through 4 are realleged and incorporated into Counts One and Two.

COUNT 1
[18 U.S.C. §§ 249(a)(2) & 2]

On or about January 29, 2023, in the Southern District of Ohio, defendant **IZAYE EUBANKS** aka "JoJo", aided and abetted by others, did willfully cause bodily injury to R.L. because of R.L.'s actual and perceived national origin, namely that he is Haitian; the offense

conduct, interfered with commercial and other economic activity in which R.L. was engaged at the time of the conduct and otherwise affected interstate and foreign commerce.

In violation of 18 U.S.C. §§ 249(a)(2) and 2.

COUNT 2
[18 U.S.C. §§ 249(a)(2) & 2]

On or about January 29, 2023, in the Southern District of Ohio, defendant **IZAYE EUBANKS** aka “JoJo”, aided and abetted by others, did willfully cause bodily injury to J.M. because of J.M.’s actual and perceived national origin, namely that he is Haitian; the offense conduct, occurred during the course of and as a result of the travel of the defendant and the victim using a channel, facility, and instrumentality of interstate commerce and the conduct otherwise affected interstate and foreign commerce.

In violation of 18 U.S.C. §§ 249(a)(2) and 2.

KENNETH L. PARKER
UNITED STATES ATTORNEY



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